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11 *Attorneys for Plaintiff*

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 IN RE: UBER TECHNOLOGIES, INC.,
17 PASSENGER SEXUAL ASSAULT
18 LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

19 **ATTORNEY WALT CUBBERLY'S**
20 **DECLARATION IN SUPPORT OF**
21 **WILLIAM HART & BOUNDAS**
22 **PLAINTIFFS' OPPOSITION TO**
DEFENDANTS' MOTION DISMISS
CASES FOR FAILURE TO COMPLY
WITH PTO 10

23 This Document Relates to:

24 *WHB 304 v. Uber Technologies, Inc., et al.,*
25 *No. 3:24-cv-04801*

26 *WHB 1882 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-04813

27 *WHB 322 v. Uber Technologies, Inc., et al.,*
28 *No. 3:24-cv-04814*

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 *WHB 1478 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-04833*

3 *WHB 188 v. Uber Technologies, Inc., et al.,*
4 *No. 3:24-cv-04834*

5 *WHB 1123 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-04850*

7 *WHB 1144 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-04859*

9 *WHB 1914 v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-04869*

11 *WHB 199 v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-04870*

13 *WHB 1030 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-04874*

15 *WHB 196 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-04886*

17 *WHB 526 v. Uber Technologies, Inc., et al.,*
18 *No. 3:24-cv-04901*

19 *WHB 950 v. Uber Technologies, Inc., et al.,*
20 *No. 3:24-cv-04931*

21 *WHB 1462 v. Uber Technologies, Inc., et*
22 *al., No. 3:24-cv-04935*

23 *WHB 1531 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-04937*

25 *WHB 1847 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-04945*

27 *WHB 1858 v. Uber Technologies, Inc., et*
28 *al., No. 3:24-cv-04948*

WHB 1670 v. Uber Technologies, Inc., et
al., No. 3:24-cv-04949

WHB 1936 v. Uber Technologies, Inc., et
al., No. 3:24-cv-04950

WHB 757 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04954

WHB 1387 v. Uber Technologies, Inc., et
al., No. 3:24-cv-04958

1 *WHB 1546 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-04969*

3 *WHB 603 v. Uber Technologies, Inc., et al.,*
4 *No. 3:24-cv-04971*

5 *WHB 1896 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-04975*

7 *WHB 974 v. Uber Technologies, Inc., et al.,*
8 *No. 3:24-cv-04977*

9 *WHB 696 v. Uber Technologies, Inc., et al.,*
10 *No. 3:24-cv-04979*

11 *WHB 1834 v. Uber Technologies, Inc., et*
12 *al., No. 3:24-cv-04980*

13 *WHB 175 v. Uber Technologies, Inc., et al.,*
14 *No. 3:24-cv-04982*

15 *WHB 1916 v. Uber Technologies, Inc., et*
16 *al., No. 3:24-cv-05003*

17 *WHB 1845 v. Uber Technologies, Inc., et*
18 *al., No. 3:24-cv-05015*

19 *WHB 1269 v. Uber Technologies, Inc., et*
20 *al., No. 3:24-cv-05025*

21 *WHB 400 v. Uber Technologies, Inc., et al.,*
22 *No. 3:24-cv-05034*

23 *WHB 999 v. Uber Technologies, Inc., et al.,*
24 *No. 3:24-cv-05036*

25 *WHB 1891 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-05037*

27 *WHB 755 v. Uber Technologies, Inc., et al.,*
28 *No. 3:24-cv-05039*

WHB 3 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05061

WHB 599 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05062

WHB 1606 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05066

WHB 979 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05082

1 *WHB 1953 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-05085*

3 *WHB 1865 v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-05089*

5 *WHB 1967 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-05094*

7 *WHB 1414 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05095*

9 *WHB 862 v. Uber Technologies, Inc., et al.,*
10 *No. 3:24-cv-05097*

11 *WHB 1386 v. Uber Technologies, Inc., et*
12 *al., No. 3:24-cv-05128*

13 *WHB 1425 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-05129*

15 *WHB 427 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05132*

17 *WHB 1876 v. Uber Technologies, Inc., et*
18 *al., No. 3:24-cv-05230*

19 *WHB 1382 v. Uber Technologies, Inc., et*
20 *al., No. 3:24-cv-05232*

21 *WHB 428 v. Uber Technologies, Inc., et al.,*
22 *No. 3:24-cv-05236*

23 *WHB 1962 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-05240*

25 *WHB 504 v. Uber Technologies, Inc., et al.,*
26 *No. 3:24-cv-05243*

27 *WHB 1555 v. Uber Technologies, Inc., et*
28 *al., No. 3:24-cv-05254*

WHB 70 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05261

WHB 1549 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05275

WHB 1909 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05280

WHB 662 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05355

1 *WHB 1338 v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-05434*

3 *WHB 704 v. Uber Technologies, Inc., et al.,*
4 *No. 3:24-cv-05436*

5 *WHB 1476 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-05450*

7 *WHB 1888 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05457*

9 *WHB 335 v. Uber Technologies, Inc., et al.,*
10 *No. 3:24-cv-05460*

11 *WHB 1048 v. Uber Technologies, Inc., et*
12 *al., No. 3:24-cv-05462*

13 *WHB 1443 v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-05472*

15 *WHB 1596 v. Uber Technologies, Inc., et*
16 *al., No. 3:24-cv-05473*

17 *WHB 58 v. Uber Technologies, Inc., et al.,*
18 *No. 3:24-cv-05477*

19 *WHB 1593 v. Uber Technologies, Inc., et*
20 *al., No. 3:24-cv-05504*

21 *WHB 1673 v. Uber Technologies, Inc., et*
22 *al., No. 3:24-cv-05552*

23 *WHB 1860 v. Uber Technologies, Inc., et*
24 *al., No. 3:24-cv-05568*

25 *WHB 1613 v. Uber Technologies, Inc., et*
26 *al., No. 3:24-cv-05574*

27 *WHB 1053 v. Uber Technologies, Inc., et*
28 *al., No. 3:24-cv-05612*

WHB 519 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05627

WHB 393 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05633

WHB 1416 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05667

WHB 1843 v. Uber Technologies, Inc., et
al., No. 3:24-cv-05693

1 *WHB 505 v. Uber Technologies, Inc., et al.,*
2 *No. 3:24-cv-05709*

3 *WHB 413 v. Uber Technologies, Inc., et al.,*
4 *No. 3:24-cv-05782*

5 *WHB 1317 v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-05791*

7 *WHB 1481 v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-05794*

9 *WHB 695 v. Uber Technologies, Inc., et al.,*
10 *No. 3:24-cv-05799*

11 *WHB 885 v. Uber Technologies, Inc., et al.,*
12 *No. 3:24-cv-05952*

13 *WHB 520 v. Uber Technologies, Inc., et al.,*
14 *No. 3:24-cv-05954*

15 *WHB 678 v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05961*

17 *WHB 2083 v. Uber Technologies, Inc., et*
18 *al., No. 3:25-cv-01178*

19 *WHB 2052 v. Uber Technologies, Inc., et*
20 *al., No. 3:25-cv-01129*

21 *WHB 2055 v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-01245*

23 *WHB 2056 v. Uber Technologies, Inc., et*
24 *al., No. 3:25-cv-01246*

25 I, Walt Cubberly, declare as follows:

- 26 1. I am an attorney at Williams Hart & Boundas LLP admitted to practice before the courts
27 of the State of California. I am one of the counsels of record for all filed WHB claimants.
28 I have personal knowledge of the matters set forth herein, and if called to testify, I would
testify competently to the information below:
2. This declaration is made in support of the Opposition to Defendants' Motion to Dismiss
Cases for Failure to Comply with PTO 10.

- 1 3. Plaintiff WHB 1882, ID 1531 uploaded a signed verification to MDL Centrality on November 4,
2 2025. **Exhibit A** to the Declaration of Walt Cubberly.
- 3 4. Plaintiff WHB 322, ID 1586 uploaded a signed verification to MDL Centrality on November 4,
4 2025. **Exhibit B** to the Declaration of Walt Cubberly.
- 5 5. Plaintiff WHB 188, ID 1539 uploaded a signed verification to MDL Centrality on November 4,
6 2025. **Exhibit C** to the Declaration of Walt Cubberly.
- 7 6. Plaintiff WHB 1914, ID 1605 uploaded a signed verification to MDL Centrality on November 4,
8 2025. **Exhibit D** to the Declaration of Walt Cubberly.
- 9 7. Plaintiff WHB 1030, ID 1571 uploaded a signed verification to MDL Centrality on November 4,
10 2025. **Exhibit E** to the Declaration of Walt Cubberly.
- 11 8. Plaintiff WHB 1462, ID 1683 uploaded a signed verification to MDL Centrality on November 4,
12 2025. **Exhibit F** to the Declaration of Walt Cubberly.
- 13 9. Plaintiff WHB 1858, ID 1619 uploaded a signed verification to MDL Centrality on November 4,
14 2025. **Exhibit G** to the Declaration of Walt Cubberly.
- 15 10. Plaintiff WHB 1670, ID 1685 uploaded a signed verification to MDL Centrality on November 4,
16 2025. **Exhibit H** to the Declaration of Walt Cubberly.
- 17 11. Plaintiff WHB 757, ID 1621 uploaded a signed verification to MDL Centrality on November 3,
18 2025. **Exhibit I** to the Declaration of Walt Cubberly.
- 19 12. Plaintiff WHB 1546, ID 1689 uploaded a signed verification to MDL Centrality on November 4,
20 2025. **Exhibit J** to the Declaration of Walt Cubberly.
- 21 13. Plaintiff WHB 603, ID 1633 uploaded a signed verification to MDL Centrality on November 4,
22 2025. **Exhibit K** to the Declaration of Walt Cubberly.
- 23 14. Plaintiff WHB 1896, ID 1638 uploaded a signed verification to MDL Centrality on November 3,
24 2025. **Exhibit L** to the Declaration of Walt Cubberly.
- 25 15. Plaintiff WHB 974, ID 1694 uploaded a signed verification to MDL Centrality on November 4,
26 2025. **Exhibit M** to the Declaration of Walt Cubberly.
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- 1 16. Plaintiff WHB 696, ID 1695 uploaded a signed verification to MDL Centrality on November 5,
2 2025. **Exhibit N** to the Declaration of Walt Cubberly.
- 3 17. Plaintiff WHB 1834, ID 1696 uploaded a signed verification to MDL Centrality on November 4,
4 2025. **Exhibit O** to the Declaration of Walt Cubberly.
- 5 18. Plaintiff WHB 1269, ID 1732 uploaded a signed verification to MDL Centrality on November 4,
6 2025. **Exhibit P** to the Declaration of Walt Cubberly.
- 7 19. Plaintiff WHB 999, ID 1748 uploaded a signed verification to MDL Centrality on November 3,
8 2025. **Exhibit Q** to the Declaration of Walt Cubberly.
- 9 20. Plaintiff WHB 755, ID 1746 uploaded a signed verification to MDL Centrality on November 4,
10 2025. **Exhibit R** to the Declaration of Walt Cubberly.
- 11 21. Plaintiff WHB 599, ID 1764 uploaded a signed verification to MDL Centrality on November 4,
12 2025. **Exhibit S** to the Declaration of Walt Cubberly.
- 13 22. Plaintiff WHB 1606, ID 1757 uploaded a signed verification to MDL Centrality on November 4,
14 2025. **Exhibit T** to the Declaration of Walt Cubberly.
- 15 23. Plaintiff WHB 1953, ID 1765 uploaded a signed verification to MDL Centrality on November 4,
16 2025. **Exhibit U** to the Declaration of Walt Cubberly.
- 17 24. Plaintiff WHB 1865, ID 1767 uploaded a signed verification to MDL Centrality on November 4,
18 2025. **Exhibit V** to the Declaration of Walt Cubberly.
- 19 25. Plaintiff WHB 1967, ID 1768 uploaded a signed verification to MDL Centrality on November 4,
20 2025. **Exhibit W** to the Declaration of Walt Cubberly.
- 21 26. Plaintiff WHB 862, ID 1717 uploaded a signed verification to MDL Centrality on November 4,
22 2025. **Exhibit X** to the Declaration of Walt Cubberly.
- 23 27. Plaintiff WHB 1386, ID 1878 uploaded a signed verification to MDL Centrality on November 3,
24 2025. **Exhibit Y** to the Declaration of Walt Cubberly.
- 25 28. Plaintiff WHB 504, ID 1838 uploaded a signed verification to MDL Centrality on November 4,
26 2025. **Exhibit Z** to the Declaration of Walt Cubberly.
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- 1 29. Plaintiff WHB 1555, ID 1919 uploaded a signed verification MDL Centrality on November 4,
2 2025. **Exhibit AA** to the Declaration of Walt Cubberly.
- 3 30. Plaintiff WHB 70, ID 1899 uploaded a signed verification to MDL Centrality on November 3,
4 2025. **Exhibit BB** to the Declaration of Walt Cubberly.
- 5 31. Plaintiff WHB 1909, ID 1936 uploaded a signed verification to MDL Centrality on November 3,
6 2025. **Exhibit CC** to the Declaration of Walt Cubberly.
- 7 32. Plaintiff WHB 1338, ID 1974 uploaded a signed verification to MDL Centrality on November 4,
8 2025. **Exhibit DD** to the Declaration of Walt Cubberly.
- 9 33. Plaintiff WHB 1888, ID 1941 uploaded a signed verification to MDL Centrality on November 4,
10 2025. **Exhibit EE** to the Declaration of Walt Cubberly.
- 11 34. Plaintiff WHB 335, ID 1942 uploaded a signed verification to MDL Centrality on November 4,
12 2025. **Exhibit FF** to the Declaration of Walt Cubberly.
- 13 35. Plaintiff WHB 1593, ID 1973 uploaded a signed verification to MDL Centrality on November 4,
14 2025. **Exhibit GG** to the Declaration of Walt Cubberly.
- 15 36. Plaintiff WHB 1613, ID 1968 uploaded a signed verification to MDL Centrality on November 4,
16 2025. **Exhibit HH** to the Declaration of Walt Cubberly.
- 17 37. Plaintiff WHB 1053, ID 2154 uploaded a signed verification to MDL Centrality on November 4,
18 2025. **Exhibit II** to the Declaration of Walt Cubberly.
- 19 38. Plaintiff WHB 1843, ID 2193 uploaded a signed verification to MDL Centrality on November 4,
20 2025. **Exhibit JJ** to the Declaration of Walt Cubberly.
- 21 39. Plaintiff WHB 505, ID 2186 uploaded a signed verification to MDL Centrality on November 4,
22 2025. **Exhibit KK** to the Declaration of Walt Cubberly.
- 23 40. Plaintiff WHB 413, ID 2198 uploaded a signed verification to MDL Centrality on November 4,
24 2025. **Exhibit LL** to the Declaration of Walt Cubberly.
- 25 41. Plaintiff WHB 1481, ID 2201 uploaded a signed verification to MDL Centrality on November 5,
26 2025. **Exhibit MM** to the Declaration of Walt Cubberly.
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42. Plaintiff WHB 695, ID 2202 uploaded a signed verification to MDL Centrality on November 4, 2025. **Exhibit NN** to the Declaration of Walt Cubberly.

43. Plaintiff WHB 885, ID 2128 uploaded a signed verification to MDL Centrality on November 4, 2025. **Exhibit OO** to the Declaration of Walt Cubberly.

44. Plaintiff WHB 520, ID 2205 uploaded a signed verification to MDL Centrality on November 4, 2025. **Exhibit PP** to the Declaration of Walt Cubberly.

45. Plaintiff WHB 2083, ID 2875 uploaded a signed verification to MDL Centrality on November 3, 2025. **Exhibit QQ** to the Declaration of Walt Cubberly.

46. Plaintiff WHB 1476, ID 1978 uploaded a signed verification to MDL Centrality on November 5, 2025. **Exhibit RR** to the Declaration of Walt Cubberly.

47. Plaintiff WHB 1847, ID 1693 uploaded a signed verification to MDL Centrality on November 4, 2025. **Exhibit SS** to the Declaration of Walt Cubberly.

48. Plaintiff WHB 400, ID 1727 uploaded a signed verification to MDL Centrality on November 5, 2025. **Exhibit TT** to the Declaration of Walt Cubberly.

49. Plaintiff WHB 662, ID 1940 uploaded an amended PFS and signed verification to MDL Centrality on November 5, 2025. **Exhibit UU** to the Declaration of Walt Cubberly.

50. On September 16, 2025, the Court entered an Order Regarding Motion to Dismiss Cases for Failure to Comply with PTO 10. This order pertained to certain WHB cases. **Exhibit VV** to the Declaration of Walt Cubberly.

51. I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on November 5, 2025 in Houston, Texas.

Dated: November 5, 2025

/s/ Walt Cubberly
Walt Cubberly

Attorneys for Plaintiff